

LOCAL BANKRUPTCY FORM 5071-1
IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE:	:	BANKRUPTCY NO. 5-15-02647(JJT)
SCOTT HALPERN	:	
Debtor(s)	:	CHAPTER 13
	:	
And	:	
ROSEMARY HALPERN	:	Nature of Proceeding: Request Continuance
Co-Debtor	:	of Hearing for Reasons stated below:
	:	
ALLY FINANCIAL INC.	:	
Movant(s)	:	
	:	
SCOTT HALPERN	:	Pleading: Ally Financial Inc.'s Motion for
CHARLES J. DEHART, III, Trustee	:	Relief from the Stay
Respondent(s)	:	Document #: 81

REQUEST TO CONTINUE HEARING/TRIAL WITH CONCURRENCE

This request must be filed at least twenty-four (24) hours prior to the hearing. All requests must be approved by the Court. Submitting a request is not an automatic continuance.

The undersigned hereby requests a continuance with concurrence of the opposing party (parties). This is a first request for a continuance.

Reason for the Continuance.

Request more time for Ally Financial Inc. and the Debtor to work out a resolution.

Contemporaneous with the filing of this request, the undersigned has served a copy of this request upon all counsel participating in this proceeding.

Dated: May 9, 2017

s/ Regina Cohen

Attorney for Ally Financial Inc.
Regina Cohen, Esquire
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